

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND
NORTHERN DIVISION

STUDENTS FOR FAIR ADMISSIONS,
Plaintiff,

v.

THE UNITED STATES NAVAL ACADEMY,
et al.,

Defendants.

No. 1:23-cv-02699

DECLARATION OF EDWARD BLUM

1. I am over the age of 18, of sound mind, and otherwise competent to sign this declaration.

2. I am the President of Students for Fair Admissions, Inc. SFFA is an Internal Revenue Code Section 501(c)(3), voluntary membership organization. SFFA was formed for the purpose of defending human and civil rights secured by law—including the individual right to equal protection under the law—through litigation and other lawful means. More specifically, SFFA promotes and protects the right of the public to be free from discrimination on the basis of race in higher-education admissions.

3. SFFA is a nonprofit membership group of more than 20,000 students, parents, and others who believe that racial classifications and preferences in college admissions, including the academies, are unfair, unnecessary, and unconstitutional. SFFA has members in Maryland and throughout the country.

4. SFFA has members, including Members A and B, who are ready and able to apply to the United States Naval Academy but cannot compete for admission on equal footing because of the Academy's race-based admissions program.

5. Through SFFA, I know Members A-B. I have learned their backgrounds and discussed their plans and intentions. Members A-B voluntarily joined SFFA, support its mission, receive updates

about the status of the case from me, and have the opportunity to give input and direction on this case.

6. Members A-B would be unwilling to litigate this lawsuit absent anonymity protections.

7. Throughout my career, I have witnessed firsthand the retaliation that individuals can receive for bringing litigation challenging racial preferences. For example, I supported Abigail Fisher in her challenge to affirmative action in *Fisher v. Univ. of Texas at Austin* (“*Fisher I*”), 570 U.S. 297 (2013), and *Fisher v. Univ. of Texas at Austin* (“*Fisher II*”), 579 U.S. 365 (2016). Ms. Fisher “endured consistent harassment since 2008” as “a direct result of [her] involvement in that case.” *SFFA v. Harvard Coll.*, No. 1:14-cv-14176 (D. Mass. Apr. 29, 2016), ECF 150-4 ¶3. She experienced “threats” and “insults” from across the country, and she suffered professionally. *See id.* ¶¶5, 9-10. Ms. Fisher explained that these experiences “often led [her] to second-guess [her] involvement in the case and as an advocate against unlawful affirmative action policies.” *Id.* ¶11.

8. As a Jewish man, I regularly receive vile, anti-Semitic messages—including death threats—for my role leading organizations that oppose racial preferences. To take just a few examples:

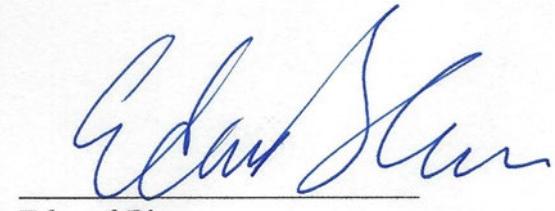
- a. A few days after filing a recent lawsuit challenging racial classifications in Georgia, one anonymous poster on X attached my picture and wished for my death: “Ed Blum: I Hope You Are No Longer With Us Sooner Rather Than Later #EdwardBlum #SufferYouCoward #PureEvil.” @BrentRe20846159, X (Aug. 5, 2023 5:49pm), twitter.com/BrentRe20846159/status/1687943813300449280.
- b. I often receive threatening voicemails. Recently, one message said, in an ominous voice, “I heard you didn’t want to grow old. Guess what? That might just happen. You need to understand, [inaudible] is after you. And he’s going to get you. Just think about that. When you look behind ya, you’ll never know what’s coming at ya.”
- c. Even more recently, another voicemail said: “What’s up you racist piece of fucking shit? You motherfuckers like you ruin America. You’re fucking nothing. If I were you I would look over my goddamn shoulder every day I fucking woke up. You’re a sorry, scumbag piece of fucking shit. I see why you don’t answer your fucking phone you fucking coward. You piece of shit motherfucker. You’re going to get yours one day. Someone’s going to get you. You racist piece of fucking shit. And when they do, I’m going to be at your fucking funeral. I’m going to piss all over your coffin and shit all over it - knock it over, burn it - do whatever the fuck I want. Fuck your family. Fuck all you motherfuckers.”

- d. Another poster, commenting on a peaceful protest led by black men, complained that the protest was peaceful while “Ed Blum is wa[ll]king around untouched.” @mediamoll, X (Aug. 22, 2023 2:10pm), twitter.com/mediamoll/status/1694049302291636274.
- e. Someone named Kate Smith submitted a website comment on August 22, 2023, saying she’s “praying God removes you from this world; you don’t belong here.”
- f. A popular Instagram user, with nearly 200,000 followers, posted about a lawsuit I was involved with—gratuitously adding rumored information about the city where I live and even the color of my house. @itskimberlyrennee, Instagram (Aug. 15), instagram.com/reel/Cv90JzIt7bE/?utm_source=ig_web_button_share_sheet&igshid=Y2Q0NmNiMjc3NQ%3D%3D.
- g. Another poster, a professor at Drake University and the founder of the Black Men’s Literacy Project, added that “Ed Blum” backing this a lawsuit challenging racial classifications proves that “Jews have no ethics but benefits from donors.” @babyboi2u, X, (Aug. 28, 2023 7:24am), twitter.com/babyboi2u/status/1696121655737688348.
- h. Another anonymous poster urged people “to go on the offensive with Ed Blum” by “drag[ging] his racist ass into the light.” @510PPM06, X (Aug. 14, 2023 10:24am), twitter.com/510PPM06/status/1691093539571249153.

9. Based on these experiences (and many others), I believe Members A-B would face the same type of insults, threats, and harassment absent anonymity protections.

10. Per 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 6, 2023



Edward Blum
President of Students for Fair Admissions